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CHAIRMAN

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BEFORE THE ARIZONA CORPORATION COMN

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> IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC, INC. FOR APPROVAL OF ITS 2015 ENERGY EFFICIENCY IMPLEMENTATION PLAN.

Docket No. E-04204A-04004tio8 Commission DOCKETED

OCT 15 2015

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RUCO's COMMENTS

The Residential Utility Consumer Office ("RUCO") submits the following comments in response to Staff's August 26, 2015, memorandum on the approval of UNS Electric, Inc.'s, 2015-2016 Energy Efficiency (EE) Plan.

RUCO supports Staff's recommendation to approve the 2015-2016 EE Plan and the new EE measures it found to be cost-effective. The Plan would simply provide customers with more options to save energy without increasing the Demand Side Management Surcharge, at least for the time being. In this way it will enable UNS Electric to respond to the changing needs of residential ratepayers and the market while keeping costs stable for all ratepayers.

RESPECTFULLY SUBMITTED this 15th day of October, 2015.

Daniel W. Pozefsky Chief Counsel

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1	AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 15th day of October, 2015 with:
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3	Docket Control Arizona Corporation Commission 1200 West Washington
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5	Phoenix, Arizona 85007
6	COPIES of the foregoing hand delivered/ mailed this 15th day of October, 2015 to:
7	Dwight Nodes
8	Hearing Division Arizona Corporation Commission 1200 West Washington
9	Phoenix, Arizona 85007
10	Janice Alward Legal Division
11	Arizona Corporation Commission
12	1200 West Washington Phoenix, Arizona 85007
13	Thomas Broderick, Director Utilities Division
14	Arizona Corporation Commission
15	1200 West Washington Phoenix, Arizona 85007
16	Michael W. Patten Snell and Wilmer, LLP
17	400 E. Van Buren St., Suite 1900 Phoenix, Arizona 85004
18	
19	Bradley S. Carroll UNS Electric, Inc.
20	88 E. Broadway, MS HQE910 P.O. Box 711 Tucson, Arizona 85702
21	
22	
23	By Chery Frauloh

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